REMARKS

Applicants respectfully traverse the rejections and maintain the arguments set forth in their last response (filed on 9/18/2006). No claims have been amended, cancelled or added in this response.

Claims 31-38, 40-50 and 57-66 are pending and stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent no. 5,761,669 of Montague et al. ("Montague ") in view of U.S. Patent no. 6,023,765 of Kuhn ("Kuhn").

Claim 31 is representative of Applicants' independent claims for purposes of discussing the present rejections. Claim 31 recites:

> 31. (Previously Presented) A method of operating a file server, said method including:
>
> identifying a file on said file server as using a first security style selected from among a plurality of security styles corresponding to a plurality of security styles implemented on said file server; and
>
> mapping access control limits in another one of said plurality of security styles into said first security style, **comprising performing static mapping for validation of said access control limits for said file and performing dynamic mapping for reading or modification of said access control limits for said file**. (Emphasis added.)

The Examiner has acknowledged that "Montague does not disclose wherein said mapping is static for validation of said access control limits for said file." Final Office Action, page 4. However, the Examiner contends that "Kuhn teaches that static mapping is possible as an additional means for establishing access rights for another security style (col. 8, lines 5-15; col. 9, line 50 - col. 10, line 50)." Id.

First, it is well-settled that to establish a *prima facie* case of obviousness, the cited combination of references must teacher suggest *all of the limitations* in each rejected claim. Ex parte Grasselli, 231 USPQ 393 (Bd. App. 1983) aff'd mem. 738 F.2d

453 (Fed. Cir. 1984); MPEP 2143.03. Applicants would like to point out that the Examiner's characterization of Kuhn's teaching (quoted above) does not track the claim language regarding the limitation that the Examiner acknowledges is missing from Montague, nor is the Examiner's characterization of Kuhn even functionally equivalent to that missing limitation.

The claim limitation which is not disclosed in Montague (as acknowledged by the Examiner) is: "performing static mapping for validation of said access control limits for said file." However, the Examiner only alleges that "Kuhn teaches that static mapping is possible as an additional means *for establishing access rights for another security style*" (emphasis added). *Establishing* access rights (as the Examiner alleges Kuhn teaches) is not the same thing as, or equivalent to, *validation* of access control limits (per claim 31). Therefore, even if the Examiner's characterization of Kuhn's teaching (quoted above) is correct, the cited combination of Montague-Kuhn still does not disclose or suggest *all of the limitations* of claim 31. For at least this reason, the rejection is incorrect and should be withdrawn.

In addition, what Kuhn actually discloses is a technique for mapping a role to a {compartment, security level} set *within a particular security style* (col. 10, lines 3-31), *not* mapping anything *from one security style to another security style* per the present invention. Thus, Kuhn does not come close to providing the claim limitation which the Examiner acknowledges is missing from Montague, i.e., performing static mapping for *validation* of access control limits for a file *as part of mapping access control limits in one security style into another security style*. For this additional reason, the rejection is incorrect and should be withdrawn.

Furthermore, in responding to Applicants' most recent arguments, the Examiner points to certain disclosure of a form of dynamic mapping in Kuhn and concludes, "Thus, as the preferred embodiment of Kuhn teaches using static [MLS] and dynamic [RBAC] mapping *concurrently* to remedy this disadvantage (column 7, lines 30-40), thus motivation remains to combine the references." Final Office Action, pages 2-3 (emphasis added). Applicants respectfully submit that the Examiner mischaracterizes Kuhn in this regard. Kuhn does *not* disclose or suggest using static and dynamic mapping *concurrently*; Kuhn clearly discloses that these are two *alternative* forms of mapping: "The above describes mapping from roles to {compartment, level} sets dynamically . . .. Implementing RBAC by mapping from roles to compartment at system in initialization time, *rather than* dynamically . . . provides two significant advantages over the dynamic mapping method . . .." Col. 10, lines 30-38 (emphasis added).

Thus, Applicants maintain their arguments that neither Montague nor Kuhn discloses or suggests using both static mapping *and* dynamic mapping as part of *mapping access control limits in one security style into another security style*. Applicants further maintain their arguments that the Examiner has not shown any real *motivation* for combining the teachings of Kuhn and Montague; a contrary contention can only be based upon *improper* hindsight gained solely from Applicants' disclosure. For this additional reason, the rejection is incorrect and should be withdrawn.

Therefore, Applicants respectfully maintain that the rejection of claim 31 is incorrect and should be withdrawn. Independent claim 43 includes limitations similar to those in claim 31 discussed above and is therefore patentable for similar reasons.

Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.
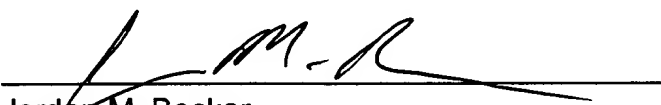
Conclusion

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

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